REMARKS/ARGUMENTS

Pending claims 1, 3-7, 11, 13-17, 21, 23-24 and 26-32 stand rejected under 35 U.S.C. §103(a) over U.S. Patent No. 5,157,905 (Powell) and U.S. Patent No. 6,718,519 (Taieb), and further in view of U.S. Patent No. 6,425,123 (Rojas). Applicant respectfully traverses the rejection.

As to claim 1, nowhere does Powell teach or suggest converting characters to a first code format having a double-byte length if the characters of a first type and converting characters to a second code format having a multiple double-byte length if the characters are of a second type. This is so, as Powell does not perform "converting" as contended by the Office Action. Instead, Powell merely discloses that document representations are "characterized" or "mapped" to target values. Powell, col. 11, ln. 59 – col. 12, ln. 18. These characterizations are not conversions, as the original document representation still exists in its original form. In contrast the claimed characters are converted into a different format, not merely mapped. For at least these reasons, claim 1 and the claims depending therefrom are patentable over the proposed combination.

Nor do any of the cited references teach or suggest converting the characters to a first code format having a double-byte length if the characters are of a first type and converting the characters to a second code format having a multiple double-byte length if the characters are of a second type. In this regard, the Office Action concedes that Powell nowhere teaches or suggests this claimed conversion. Nor does Taieb, also conceded by the Office Action. Still further, Rojas, contended by the Office Action to teach this missing subject matter, also fails in this regard. That is, Rojas nowhere teaches or suggests converting characters to different code formats having different byte lengths based on a character type. Instead, Rojas merely teaches conversion of single-byte characters to double-byte equivalents. Nowhere does Rojas teach or suggest converting characters to a first code format having a double-byte length if the characters are of a first type and converting the characters to a second code format having a multiple double-byte length if the characters are of a second type. For this further reason, claim 1 and its dependent claims are patentable over the proposed combination.

Further, there is no motivation to combine Powell and Taieb. In this regard, Powell is directed to statistical text analysis (Powell, col. 1, lns. 5-10). In contrast, Taieb is directed to displaying multiple language documents. The mapping of characters into 2D or 3D characterizations done in Powell is merely to determine a language in which the document was

created. *E.g.*, Powell, col. 11, lns. 62-67. Powell teaches no other use for these 2D and 3D characterizations. Taieb, on the other hand, is directed to displaying multilingual texts. However, Taieb nowhere teaches or suggests use of conversion of characters to different code formats based on a type of the character.

Further, the combining of Powell and Taieb proposed by the Office Action would make no sense, and would not meet the recited subject matter of claim 1. That is, even if the 2D and 3D characterizations generated in Powell were displayed using the teaching of Taieb, no display of characters would result as recited by claim 1. Instead, a statistical 2D or 3D characterization would appear—not characters. Further, the combination of Powell and Taieb with Rojas also fails to meet the subject matter of claim 1. That is, even if the characterizations generated in Powell are displayed, the combination with Rojas still fails to teach or suggest conversion of characters to different code formats having different double-byte lengths depending upon a type of character in the received file.

Nor is there any teaching or suggestion in any of the three references to combine them in order to obtain the claimed subject matter. Accordingly, a *prima facie* case of obviousness has not been established. MPEP §2142; 2143.

Furthermore, the proposed combination would render the prior art unsatisfactory for its intended purpose. Accordingly, no suggestion or motivation can exist to make the proposed modification. MPEP 2143.01. In this regard, displaying the 2D and 3D characterizations of Powell based on the teaching in Taieb would frustrate the intended purpose of Powell, namely to perform statistical analysis to identify a language and character set. There is absolutely no reason to display the characterizations in the system of Powell. Even if displayed, the characterizations would not cause the display of the characters of the file as recited by the claims. Accordingly, for all these reasons claims 1, 3-7, 11, 13-17, 21, and 23-25 are patentable over the proposed combination.

Pending claims 2, 12 and 22 stand rejected under 35 U.S.C. §103(a) over Powell, Taieb, and Rojas and in further view of U.S. Patent No. 6,397,259 (Lincke). Applicant respectfully traverses the rejection.

As to claim 2, the Office Action concedes that none of Powell, Taieb nor Rojas teaches or suggests receiving of a web page in a plane, row, and column format. Office Action, p. 6. Nor does Lincke, contended by the Office Action to meet this claim. *Id.* Instead, Lincke merely

teaches that HTML documents include tags and attributes that are associated with text, tables and forms. Lincke, col. 21, ln. 65 – col. 22, ln. 10. However, nowhere does this or any other portion of Lincke teach or suggest that a web page is in a plane, row and column format. For these further reasons, claims 2, 12 and 22 are further patentable, along with claims 3-4, and 13-14 depending therefrom.

In view of these remarks, the application is now in condition for allowance and the Examiner's prompt action in accordance therewith is respectfully requested. The Commissioner is authorized to charge any additional fees or credit any overpayment to Deposit Account No. 20-1504.

Respectfully submitted,

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